No. 04-19-00192-CR No. 04-19-00193-CR

(CONSOLIDATED CASES)

FILED IN 4th COURT OF APPEALS SAN ANTONIO, TEXAS

7/20/2020 11:34:51 PM

STATE OF TEXAS

§ IN THE COURTMOFALPPEAUS

Clerk

VS.

§ FOURTH JUDICIAL DISTRICT

JOHNNY JOE AVALOS

§ BEXAR COUNTY, TEXAS

SECOND, UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR PANEL AND *EN BANC* REHEARING

From the 437th District Court of Bexar County, Texas Trial Court Nos. 2018-CR-7068 & 2018-CR-10374 Hon. Lori Valenzuela, Judge Presiding

In accordance with Tex. R. App. Pro. 10.5(b)(1), the undersigned counsel submits his "Second, Unopposed Motion for Extension of Time to File Motions for Panel and *En Banc* Rehearing," and shows as follows:

Appellant's motions for panel and *en banc* rehearing are due Monday, July 20, 2020, and he requests a 14-day extension, to and including Monday, August 3, 2020, to file his panel and *en banc* motions for rehearing. Counsel is currently drafting his motions, and needs additional time to finish. The undersigned counsel recently completed the following:

 Travel on college – related personal leave with eldest daughter to Rhode Island, July 8-11, 2020; 2. Opening Brief in U.S. v. Herman Ostos, Cause No. 20-50122, before the

Fifth Circuit Court of Appeals, filed on July 6, 2020;

3. Motions for panel and en banc rehearing in State v. Camron Leo Sanchez-

Vasquez, Cause No. 04-19-00518-CR, filed in this Court on June 26, 2020;

4. Opening Brief in U.S. v. Raul Ramos, Cause No. 19-50932, before the Fifth

Circuit Court of Appeals, filed on June 25, 2020;

On Monday, July 20, 2020, the undersigned counsel consulted with Ms.

Jameka Roberts, Legal Assistant in place of Mr. Andrew Warthen, Asst. Dist.

Atty. in charge of this case, who expressed no objections to the requested

extension.

WHEREFORE, Appellant, respectfully requests that this Court grant a 14-day

extension of time to file his panel and en banc motions for rehearing to, and

including Monday, August 3, 2020.

Respectfully submitted,

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By: /s/

/s/ JORGE G. ARISTOTELIDIS

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CERTIFICATE OF SERVICE

I hereby certify that on this the 20th day of July, 2020 a copy of the foregoing "Second, Unopposed Motion for Extension of Time to File Motions for Panel and *En Banc* Rehearing" has been delivered to Ms. Shameka Roberts, Legal Assistant in place of the Assistant District Attorney in charge of this case, with the Bexar County District Attorney's Office, *via* the Texas Efile system.

/s/ JORGE G. ARISTOTELIDIS

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Jorge Aristotelidis on behalf of George William Aristotelidis Bar No. 783557 jgaristo67@gmail.com

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Case Contacts

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